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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Via Electronic Filing

Re: MB Dkt 09-182, 2010 Quadrennial Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996

Dear Ms. Dortch:

In June and July 2011, the Commission released the results of several studies on media ownership that it said would provide the basis for decision-making and policy formulation for the Quadrennial Review. I examined the studies very carefully. Respectfully, I suggest that there are additional research questions that must be examined in order to give the Commission adequate information on which to base policy decisions.

Specifically, none of the studies examined the possible effect of formal news and resource sharing agreements among television stations in one market on local television news. The agreements to which I refer are Shared Services Agreements (SSA), Joint Services Agreements (JSA), Local Marketing/Management Agreements (LMA) and Local News Sharing Agreements (LNS). These arrangements occur between or among two or more stations in the same television market and, to one extent or another, each of them consolidates some activities of the stations. This may result in stations that are ostensibly independently owned, but that are controlled by another in-market station and thus may exhibit market effects that, for all intents and purposes, are identical to consolidation.

Based on my research and that of others, there are, at least, 83 television markets in which these arrangements are operative. In spite of the prevalence of these arrangements, none of the studies Commissioned by the FCC considered their existence or possible impact. Study 4, entitled Local Information Programming and Structure of Television Markets, mentions the phenomenon, but does not address its effects. Consequently, the FCC may have compromised the policy-making value of its research by failing to account for the market impact of such arrangements.

Given the growing number of these services agreements among television stations, I respectfully suggest that the Commission must review research on their possible effect on local television news. I completed a study of one such market (Honolulu) and the results of that examination were filed with the FCC in

February 2011. I am now in the process of completing an analysis of the effects of such arrangements in eight more television markets. The preliminary analysis will be completed by October 1 and I will submit the findings to the FCC shortly after that date. It is my hope that the Commission will consider the findings in connection with the ownership proceeding.

Thank you very much.

Respectfully submitted,

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